

TO: Clerk's Office

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK



APPLICATION FOR LEAVE  
TO FILE DOCUMENT UNDER SEAL

\*\*\*\*\*  
United States v. Muhammad Naveed

-V.-

21-MJ-1020

Docket Number

\*\*\*\*\*

SUBMITTED BY: Plaintiff Defendant DOJ ☒

Name: Lauren Elbert

Firm Name: USAO-EDNY

Address:

271 Cadman Plaza East Brooklyn, NY 11201

Phone Number: 718-254-7577

E-Mail Address: lauren.elbert@usdoj.gov

INDICATE UPON THE PUBLIC DOCKET SHEET: YES NO ☒

If yes, state description of document to be entered on docket sheet:

A) If pursuant to a prior Court Order:

Docket Number of Case in Which Entered: \_\_\_\_\_

Judge/Magistrate Judge: \_\_\_\_\_

Date Entered: \_\_\_\_\_

B) If a new application, the statute, regulation, or other legal basis that authorizes filing under seal

ORDERED SEALED AND PLACED IN THE CLERK'S OFFICE,  
AND MAY NOT BE UNSEALED UNLESS ORDERED BY  
THE COURT.

DATED: Brooklyn, NEW YORK

September 1, 2021

U.S. MAGISTRATE JUDGE Marcia M. Henry

RECEIVED IN CLERK'S OFFICE \_\_\_\_\_ DATE

MANDATORY CERTIFICATION OF SERVICE:

A.) A copy of this application either has been or will be promptly served upon all parties to this action, B.) Service is excused by 31 U.S.C. 3730(b), or by the following other statute or regulation: \_\_\_\_\_; or C.) ☒ This is a criminal document submitted, and flight public safety, or security are significant concerns.  
(Check one)

DATE

SIGNATURE

Lauren Elbert

LHE  
F. #2020R00929

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

MUHAMMAD NAVEED,

Defendant.

COMPLAINT AND  
APPLICATION FOR  
ARREST WARRANT

(18 U.S.C. § 1343)

Case No. 21-MJ-1020

----- X

EASTERN DISTRICT OF NEW YORK, SS:

GEORGE KELLER, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”) duly appointed according to law and acting as such.

In or around and between February and August of 2020, within the Eastern District of New York and elsewhere, the defendant MUHAMMAD NAVEED, did knowingly and intentionally devise a scheme or artifice to defraud a victim (“Victim #1”), in order to obtain money and property from Victim #1, to wit, approximately \$204,400 in wire transfers, by means of one or more materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, did transmit and cause to be transmitted, by means of wire communication in interstate commerce, writings, signs, signals, pictures and sounds, to wit, wire transfers.

(Title 18, United States Code, Section 1343)

The source of your deponent's information and the grounds for his/her belief are as follows:<sup>1</sup>

1. I am a Special Agent with the FBI and am currently assigned to an FBI squad that investigates securities fraud, wire fraud and other financial crimes. During my tenure with the FBI, I have participated in numerous financial fraud investigations and have participated in all aspects of those investigations, including conducting surveillance, executing search warrants, debriefing defendants and informants, interviewing witnesses, reviewing and analyzing recorded conversations and analyzing telephone toll information. During the course of those investigations, I have served as the lead or co-lead investigator in the investigation and prosecution of persons involved in fraud and money laundering, among other crimes.

2. In or around February 2021, I interviewed Victim #1, who is an 83-year old male residing in Florida. Victim #1 informed me that on or about May 19, 2019, he met an individual through a dating website called "Mate1.com." This individual identified herself as "Rosemary George," and told Victim #1 that she was a physician who previously resided in China and Lowell, Massachusetts and was currently living overseas. Victim #1 and "Rosemary George" began a relationship over email. In early 2020, "Rosemary George" asked Victim #1 for a loan, explaining that she was waiting for a pension payment from the Chinese government.

3. Via email, "Rosemary George" provided Victim #1 with a Massachusetts driver's license as proof of her identity. I have spoken with the Department of Motor Vehicles for the Commonwealth of Massachusetts, who advised me that the driver's license in question

---

<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

was not on file in that state, and that no record was returned for any identifying information provided to Victim #1 by “Rosemary George,” such as her name and date of birth.

4. Review of records relating to the email address used by “Rosemary George” show that the IP addressed corresponded to locations in California. Other records relating to this email address show correspondence with email addresses to other dating websites.

5. Once Victim #1 agreed to send money to “Rosemary George,” “Rosemary George” supplied wire instructions directing Victim #1 to send the money to a bank account held at Bank of America. That bank account was opened on or about August 27, 2017 by the defendant, MUHAMMAD NAVEED, in the name of “Stitchers Corp.” (the “Stitchers account”). To open the account, NAVEED supplied a Pakistani passport and provided a business address in Richmond Hill, New York as the business address for Stitchers Corp. NAVEED is the only signatory on the account. The address supplied to Bank of America corresponds to the address supplied to New York State in connection with NAVEED’s non-driver’s identification card.

6. In total, Victim #1 sent at least four wire transfers to the Stitchers account, totaling approximately \$204,400.

WHEREFORE, your deponent respectfully requests that the defendant MUHAMMAD NAVEED be dealt with according to law.

Because public filing of this document could result in a risk of flight by the defendant MUHAMMAD NAVEWED, as well as jeopardize the government's ongoing investigation, your deponent respectfully requests that this complaint, as well as any arrest warrant issued in connection with this complaint, be filed under seal.

*George Keller*  
\_\_\_\_\_  
GEORGE KELLER  
United States Postal Inspector

Sworn to before me this  
1<sup>st</sup> day of September, 2021

*Marcia M. Henry*  
\_\_\_\_\_  
THE HONORABLE MARCIA M. HENRY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK